UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TEXAS EL PASO DIVISION

IN RE:	§	
	§	
PDG PRESTIGE, INC.,	§	Case No. 21-30107
	§	
Debtor.	§	
	§	

MOTION OF WEYCER, KAPLAN, PULASKI & ZUBER, P.C. TO WITHDRAW AS COUNSEL FOR DEBTOR

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.

IF NO TIMELY RESPONSE IS FILED WITHIN <u>TWENTY ONE (21) DAYS</u> FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.

A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

Weycer, Kaplan, Pulaski & Zuber, P.C. (and Jeff Carruth, lead counsel) (collectively, "WKPZ"), counsel to PDG Prestige Inc., the Debtor ("PDGP" or the "Debtor"), files this *Motion of Weycer, Kaplan, Pulaski & Zuber, P.C. to Withdraw as Counsel for Debtor* and in support thereof would show the Court the following.

- 1. On July 13, 2023, this case was converted to Chapter 7. See Order Converting Case to Chapter 7 (Docket No. 271).
- 2. WKPZ and Jeff Carruth wish to withdraw from this case in light of the conversion of this case to Chapter 7.
 - 3. A proposed form of order accompanies this Motion.

WHEREFORE, Weycer, Kaplan, Pulaski & Zuber, P.C., (and Jeff Carruth, lead counsel) respectfully requests that the Court enter an order withdrawing WKPZ and Jeff Carruth from the

representation of PDG Prestige Inc.. Movant respectfully requests such other and further relief to which movant is entitled at law or in equity.

Dated: July 17, 2023 Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

JEFF CARRUTH (TX SBN:. 24001846)

2608 Hibernia, Suite 105 Dallas, TX 75204-2514 Telephone: (713) 341-1158

Fax: (713) 961-5341

E-mail: jcarruth@wkpz.com

PROPOSED FORMER ATTORNEYS FOR PDG PRESTIGE INC.
DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on July 17, 2023 (1) by electronic notice to all ECF users who have appeared in this case to date, as set forth below and (2) by regular mail to all parties appearing in the attached address list (i.e. mailing matrix).

/s/ Jeff Carruth JEFF CARRUTH

ECF SERVICE LIST

21-30107-hcm Notice will be electronically mailed to:

Steven B. Bass on behalf of Creditor United States of America Internal Revenue Service

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James Michael Feuille on behalf of Plaintiff Crimmins Family Limited Partnership

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James Michael Feuille on behalf of Plaintiff White Sands Construction, Inc.

 $\underline{jfeu@scotthulse.com}, \underline{tmar@scotthulse.com; \underline{jcor@scotthulse.com}}$

James Michael Feuille on behalf of Plaintiff Dennis Crimmins jfeu@scotthulse.com, tmar@scotthulse.com;jcor@scotthulse.com

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David P. Lutz on behalf of Interested Party PDG, Inc. dplutz@qwestoffice.net

David P. Lutz on behalf of Interested Party Michael J Dixson dplutz@qwestoffice.net

David P. Lutz on behalf of Plaintiff PDG Prestige, Inc. dplutz@qwestoffice.net

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Russell W. Mills on behalf of Plaintiff Legalist DIP GP, LLC mills@bellnunnally.com, nsummerville@bellnunnally.com;tstephenson@bellnunnally.com

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James W Rose, Jr on behalf of U.S. Trustee United States Trustee - FP12

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carey.a.tompkins@usdoj.gov;Roxana.peterson@usdoj.gov;aubrey.
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Don Stecker on behalf of Creditor City Of El Paso

23-03004-cgb Doc#139-24 Filed 05/28/25 Entered 05/28/25 18:09:38 Exhibit 24. Motion to Withdraw Pg 4 of 7

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Casey Scott Stevenson on behalf of Plaintiff Crimmins Family Limited Partnership

cste@scotthulse.com, cmac@scotthulse.com

Casey Scott Stevenson on behalf of Plaintiff MDDC Investments, LLC

cste@scotthulse.com, cmac@scotthulse.com

Casey Scott Stevenson on behalf of Plaintiff White Sands Construction, Inc.

cste@scotthulse.com, cmac@scotthulse.com

Casey Scott Stevenson on behalf of Plaintiff Dennis Crimmins cste@scotthulse.com, cmac@scotthulse.com

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Gwen Irene Walraven on behalf of Plaintiff Legalist DIP GP, LLC gwalraven@bellnunnally.com, csellers@bellnunnally.com
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Postions Division MQ Post 2012	City of El Paso	c/o Don Stecker, Linebarger Goggan	112 E. Pecan St. Suite 2200	San Antonio, TX 78205-1588		ECF + Regular Mail
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201 East Main Drive #1100 8007-8100 8007-4732 Myers P.O. Box 1977 Philadelphia, PA 19101-7346 Las Cruces, TX 88011-4613 Attn: James W. Brewer Attn: James W. Brewer Attn: James W	DENNIS CRIMMINS		SCOTTHULSE PC	PO BOX 99123	EL PASO TX 79999-9123	Omit / ECF
Myers P.O. Box 1977 Myers P.O. Box 1977 Philadelphia, PA 19101-7346 LIP Attn: James W. Brewer -7196 Las Cruces, TX 88011-4613 Ad- Las Cruces, TX 88011-4613 IEI Paco, TX 78912-6150 AUSTIN, TX 78711-2548 Ad- Box 1539 EI Paso, TX 779912-6150 P.O. Box 1539 EI Paso, TX 77046-2445 Sulte 201 Anlington, TX 77046-2445 Anlington, TX 77046-2495 Sulte 201 Anlington, TX 77046-2495 Martin LLP 2323 Ross Avenue, Suite 1900	Dennis Crimmins	c/o Casey S. Stevenson	Scott Hulse	201 East Main Drive #1100	El Paso, TX 79901-1340	Omit / ECF
Myers P.O. Box 1977 Myers P.O. Box 1977 Philladelphia, PA 19101-7346 LLP Attn: James W. Brewer -7196 Las Cruces, TX 88011-4613 rd El Paso, TX 79912-6150 Ad-008 AUSTIN, TX 78711-2548 nuite 533 P.O. Box 1539 El Paso, TX 79912-6150 224, #2050 Houston, TX 77046-2445 Sulte 201 Arlington, TX 76015-2936 Martin LLP 2323 Ross Avenue, Suite 1900	Dona Ana County Treasurer	845 N Motel Blvd.	Las Cruces, TX 88007-8100			Regular Mail
Myers P.O. Box 1977 Philadelphia, PA 19101-7346 LLP Attn: James W. Brewer -7196 Las Cruces, TX 88011-4613 El Paso, TX 79912-6150 AUSTIN, TX 78711-2548 P.O. Box 1539 El Paso, TX 79912-6150 AUSTIN, TX 79912-6150 El Paso, TX 79912-6150 Austin LIP 2323 Ross Avenue, Suite 1900	Gallardo	2701 W Picacho Ave, Ste 6	Las Cruces, NM 88007-4732			Regular Mail
LLP Attn: James W. Brewer -7196 Las Cruces, TX 88011-4613 -7196 Las Cruces, TX 88011-4613 -7196 Las Cruces, TX 79912-6150 -7196 AUSTIN, TX 78711-2548 -7196 AUSTIN, TX 78711-2548 -7196 AUSTIN, TX 78711-2548 -7196 AUSTIN, TX 78912-6150 -71999 AUSTIN TX 79912-6150	HD Lending, LLC	c/o Clyde A, Pine, Jr.	Mounce, Green, Myers	P.O. Box 1977	El Paso, Texas 79999-1977	Omit / ECF
Attn: James W. Brewer -7196 Ad. Las Cruces, TX 88011-4613 AUSTIN, TX 78912-6150 AUSTIN, TX 78711-2548 P.O. Box 1539 El Paso, TX 79912-6150 AUSTIN, TX 78912-6150 El Paso, TX 79912-6150 Austin Auston, TX 77046-2445 Sulte 201 Arlington, TX 77046-2495 Martin LLP 2323 Ross Avenue, Suite 1900	Internal Revenue Service	Special Procedures Staff - Insolvency	P. O. Box 7346	Philadelphia, PA 19101-7346		Omit / ECF
LLP Attn: James W. Brewer -7196 Las Cruces, TX 88011-4613 Cl Paso, TX 79912-6150 AUSTIN, TX 78711-2548 Luite 533 P.O. Box 1539 El Paso, TX 79912-6150 El Paso, TX 79912-6150 Austin LD Arlington, TX 77046-2445 Sulte 201 Arlington, TX 77046-24936 Martin LLP 2323 Ross Avenue, Suite 1900	Michael Dixson					Omit / ECF
7-7196 148 Cruces, TX 88011-4613 151 Paso, TX 79912-6150 161 Paso, TX 79912-6150 178 AUSTIN, TX 7311-2548 179 AUSTIN, TX 7311-2548 179 AUSTIN, TX 73912-6150 179 AUSTIN, TX 79912-6150 179 AUSTIN, TX 79912-6150 179 AUSTIN, TX 77046-2445 179 AUSTIN AUSTI	New Mexico Real Estate Advisors, In	d/b/a Colliers International	c/o Kemp Smith LLP	Attn: James W. Brewer	221 N. Kansas, Ste. 1700	Omit / ECF
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EI Paso, TX 79912-6150 MC-008 AUSTIN, TX 78711-2548 F.O. Box 1539 EI Paso, TX 79912-6150 Ea, #2050 Houston, TX 77046-2445 Sulte 201 Arlington, TX 76015-2936 Martin LLP 2323 Ross Avenue, Sulte 1900	Springer Management	c/o Tom Springer	500 S. Telshor Blvd.	Las Cruces, TX 88011-4613		Omit / ECF
AC-608 AUSTIN, TX 78711-2548 Autrin 533 P.O. Box 1539 EI Paso, TX 79912-6150 2a, #2050 Houston, TX 77046-2445 Sulte 201 Arlington, TX 76015-2936 Martin LLP 2323 Ross Avenue, Suite 1900	Suresh Kumar	c/o Harrel Davis	4695 North Mesa	El Paso, TX 79912-6150		Omit / ECF
LO. Box 1539 EI Paso, TX 79912-6150 EI Paso, TX 77046-2445 Sulte 201 Arlington, TX 77045-2936 Martin LLP 2323 Ross Avenue, Suite 1900		OFFICE OF ATTORNEY GENERAL-Bank	PO BOX 12548 - MC-008	AUSTIN, TX 78711-2548		Regular Mail
EI Paso, TX 79912-6150 2a, #2050 Houston, TX 77046-2445 Sulte 201 Arlington, TX 76015-2936 Martin LLP 2323 Ross Avenue, Suite 1900	United States Trustee - EP12	U.S. Trustee's Office	615 E. Houston, Suite 533	P.O. Box 1539	San Antonio, TX 78295-1539	Omit / ECF
2a, #2050 Houston, TX 77046-2445 Suite 201 Arlington, TX 76015-2936 Martin LLP 2323 Ross Avenue, Suite 1900	Westar Investors Group LLC	c/o Harrel Davis	4695 North Mesa	El Paso, TX 79912-6150		Omit / ECF
Suite 201 Arlington, TX 76015-2936 Martin LLP 2323 Ross Avenue, Suite 1900	Jeff Carruth	Weycer Kaplan Pulaski & Zuber, P.C.	24 Greenway Plaza, #2050	Houston, TX 77046-2445		Omit / ECF
Martin LLP 2323 Ross Avenue, Suite 1900	Jeff Carruth	Weycer, Kaplan, Pulaski & Zuber, P.C	3030 Matlock Rd. Suite 201	Arlington, TX 76015-2936		Omit / ECF
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UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TEXAS EL PASO DIVISION

IN RE:	§	
PDG PRESTIGE, INC.,	§ 8	Case No. 21-30107
,,	§	
Debtor.	§	
	§	

ORDER GRANTING MOTION OF WEYCER, KAPLAN, PULASKI & ZUBER, P.C. TO WITHDRAW AS COUNSEL FOR DEBTOR (RE: DOCKET NO. 277

On this day the Court considered the *Motion of Weycer, Kaplan, Pulaski & Zuber, P.C. to Withdraw as Counsel for Debtor* (Docket No. 277) (the "Motion") filed herein on July 17, 2023 by Weycer, Kaplan, Pulaski & Zuber, P.C. The Court finds and concludes that the Motion contained the appropriate notices under the Bankruptcy Local Rules; according to the certificate of service attached to the Motion, the Motion was served upon the parties entitled to receive notice under the Bankruptcy Local Rules; no party in interest filed a response or objection to the Motion or any such response or objection is overruled by this Order; and that upon review of the record of this case and with respect to the Motion that cause exists to grant the relief requested therein.

IT IS THEREFORE ORDERED THAT:

1. The Motion is granted as set forth herein.

23-03004-cgb Doc#139-24 Filed 05/28/25 Entered 05/28/25 18:09:38 Exhibit 24. Motion to Withdraw Pg 7 of 7

- 2. All capitalized terms shall have the same meaning as ascribed to such terms in the Motion, unless otherwise defined herein.
- 3. Weycer, Kaplan, Pulaski & Zuber, P.C. and Jeff Carruth are hereby withdrawn as counsel for PDG Prestige Inc.

###

Submitted by:

Jeff Carruth (TX SBN: 24001846)

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

2608 Hibernia, Suite 105 Dallas, TX 75204-2514 Telephone: (713) 341-1158 Fax: (713) 961-5341 E-mail: jcarruth@wkpz.com

PROPOSED FORMER ATTORNEYS FOR PDG PRESTIGE INC. DEBTOR